

EXHIBIT F

Toth, Ashley L.

From: Toth, Ashley L.
Sent: Friday, April 11, 2025 2:31 PM
To: Yatvin, Alan; Marmer, Erin
Cc: Santarone, Joseph J.; Duffin, Dawn M.; Jessica Cramer; Andrew Shubin; Cohen, Noah S; Edwards, Carlene
Subject: RE: Calderaio Deps
Attachments: RE: Calderaio, John v. Central Bucks School District

Alan-

Joe and I have conferred on this and we will not be producing any additional witnesses for deposition at this time. As you know, pursuant to the Court's most recent scheduling Order depositions were required to be completed by March 28, 2025. Although we have attempted to accommodate Plaintiff's late requests for depositions, we did not receive your 30(b)(6) designation request until 3/24, which was 4 days before the fact discovery deadline. I have requested the designations numerous times, including most recently during our "meet and confer" relating to deposition scheduling on 3/5.

Since August 29, 2024 my office has been requesting deposition dates in this case. (See attached correspondence). To-date your office has noticed and taken the following twelve depositions:

1. Todd Cantrell
2. Jason Bucher
3. Marykate Schrack
4. Brian Caughe
5. Mary Kay Speese
6. Kevin Munnely
7. Louis Tenaglia
8. David Weitzel
9. Andrea Didio
10. Joseph Ohrt
11. Bridgett Szyculski
12. Katie Gaebel

This list includes Principals, a Superintendent, the Title IX representative, Director of HR, etc. At this juncture, we need to prepare for the upcoming dispositive motion deadlines and cannot accommodate your late request for 30(b)(6) deposition.

Given the amount of depositions already conducted, we will be opposing your Motion to Extend discovery.

Ashley



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